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July 17, 2025

VIA ECF & EMAIL

The Honorable John P. Cronan United States District Judge **United States District Court** Southern District of New York 500 Pearl Street New York, New York 10007

United States v. Michael Anderson, 23-CR-595 (JPC)

Dear Judge Cronan:

I write on behalf of Michael Anderson, my client in the above-captioned case, who is scheduled to be sentenced before this Court on September 5, 2025, at 10:00 a.m. ECF 238. Mr. Anderson's bail conditions restrict travel to the Southern and Eastern Districts of New York and the Western District of Washington. ECF 13.

I respectfully request that the Court permit a modification of Mr. Anderson's bail conditions to permit travel from his home in Washington to West Palm Beach, Florida, from Tuesday, July 22, 2025, to Saturday, July 26, 2025. The reason for this request is that Mr. Anderson's daughter has requested that he travel to visit her and a friend. While Mr. Anderson had previously decided not to attend over concerns about his father's health, Mr. Anderson's daughter recently gifted him with flights to/from Miami to spend time and stay with the family at an address known to both Pretrial and the government. If granted permission by this Court, Mr. Anderson would leave on a morning flight from Seattle on Tuesday (7/22), returning to Washington the night of Saturday (7/26).

The government, through AUSA Rushmi Bhaskaran, has indicated they defer to Pretrial. At the time of filing this request, Officer Mike Munsterman, U.S. Pretrial Services Officer out of the Western District of Washington, was out of office until July 22, 2025, so his position has not yet been received. Mr. Anderson has been permitted by this Court to travel on various occasions and has done so without incident.

Thank you for the Court's consideration.

The request is granted. Mr. Anderson's bail conditions are modified to permit him to travel to West Palm Beach, Florida from July 22, 2025 to July 26, 2025, to visit his daughter, provided that Mr. Anderson provides Pretrial Services with a detailed itinerary prior to the trip.

SO ORDERED July 18, 2025 New York, New York

JOHN P. CRONAN United States District Judge Respectfully submitted,

/s/

Aaron Mysliwiec Attorney for Michael Anderson